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**UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA**

Mi Familia Vota, et al.,
 Plaintiffs,
 v.
 Adrian Fontes, et al.,
 Defendants.

AND CONSOLIDATED CASES.

Case No. 2:22-cv-00509-SRB (lead)

**MFV PLS.' NOTICE REGARDING
 PROPOSED PARTY-SPECIFIC
 ADMISSIONS**

No. CV-22-00519-PHX-SRB
 No. CV-22-01003-PHX-SRB
 No. CV-22-01124-PHX-SRB
 No. CV-22-01369-PHX-SRB
 No. CV-22-01381-PHX-SRB
 No. CV-22-01602-PHX-SRB
 No. CV-22-01901-PHX-SRB

1 Rule 16(c)(2)(C) provides that “[a]t any pretrial conference, the court may consider
2 and take appropriate action” with respect to, among other things, “obtaining admissions
3 and stipulations about facts and documents to avoid unnecessary proof[.]” Fed. R. Civ. P.
4 16(c)(2)(C). In their preservatory motion in limine, *see* ECF No. 570, Plaintiffs requested
5 that the Court take notice of just such party “admissions” in order to streamline trial and
6 reduce the time needed for live examination of witnesses. As noted in that motion, the
7 parties were still discussing the matter and Plaintiffs advised that they would file the
8 admissions at issue shortly.

9 Attached to this Notice are the admissions at issue. As explained in Plaintiffs’
10 motion, the Defendants actively litigating this matter—the Attorney General, Secretary of
11 State, Republican National Committee Intervenors (“RNC”), and Legislative Intervenors
12 (“Legislators”)—individually admitted to certain facts as part of the parties’ exchange of
13 proposed stipulations but took the position that only those facts agreed to by all four
14 “active” Defendants should be included in the Joint Pretrial Order as stipulations. Plaintiffs
15 honored that request, and only stipulations agreed to by Plaintiffs and those four
16 Defendants were included in the Joint Pretrial Order. *See* Joint Pretrial Order, ECF No.
17 571, Exs. 1, 2. It remains the case, however, that each of these Defendants individually
18 admitted to specific facts proposed by Plaintiffs that are relevant to this case.¹

19 On top of that, nine County Recorder Defendants likewise provided admissions in
20 response to proposed stipulations germane to their duties or counties. These undisputed
21 party admissions relate to issues relevant to Plaintiffs’ standing and claims and, if accepted
22 by the Court, will help to “avoid unnecessary proof” at trial. No good cause exists for the
23 Court to decline to take notice of undisputed admission of fact from a significant number
24

25
26 ¹ In response to requests from the “active” Defendants, Plaintiffs provided additional
27 citations to support proposed stipulations, or counter-proposed language in the hopes of
28 reaching an agreement. Defendants have indicated that they are still in the process of
reviewing these “live” proposed stipulations and Plaintiffs do not include them here.

of Defendants in this consolidated lawsuit involving a host of parties.

To that end, MFV Plaintiffs provide the following sets of proposed admissions for the Court's consideration:

1. **Exhibit A:** Admissions from the Secretary of State, but not the Attorney General, Legislators, or RNC, in response to Plaintiffs' proposed stipulations.

2. **Exhibit B:** Admissions from the Secretary of State and Attorney General, but not the Legislators or RNC, in response to Plaintiffs' proposed stipulations.

3. **Exhibit C:** Admissions from the Secretary of State, Attorney General, and Legislators, but not the RNC, in response to Plaintiffs' proposed stipulations.

4. **Exhibit D:** Admissions from the Graham, Greenlee, La Paz, Mohave, Pima, Santa Cruz, Yavapai, Yuma, and Coconino County Recorders in response to proposed stipulations regarding the duties of the County Recorder, or other county-specific facts.

Dated: October 24, 2023

Respectfully submitted,

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